

KANAB RESOURCE AREA OFFICE  
318 NORTH FIRST EAST  
KANAB, UTAH 84741  
(801) 644-2672

3809  
UT-048  
UTU-67098

October 21, 1991

CERTIFIED NO. P 002 445 011  
RETURN RECEIPT REQUESTED

Paul Lamoreaux  
P. O. Box 610  
Parowan, UT 84761


Dear Mr. Lamoreaux:

We have recently inspected your alabaster mining operations in Dry Valley and Butler Valley near Kodachrome State Park (Teddi, Uncle Red, Berry Patch, and Raspberry claim groups). A considerable amount of litter (blue plastic oil containers and aluminum Mountain Dew soda pop cans) was observed on the sites of your operations. The presence of litter does not comply with the Plan of Operations which you have filed for these claims. Our records indicate that we have asked you in the past to keep your operations free of litter. I would also remind you that leaving trash on public lands is illegal.

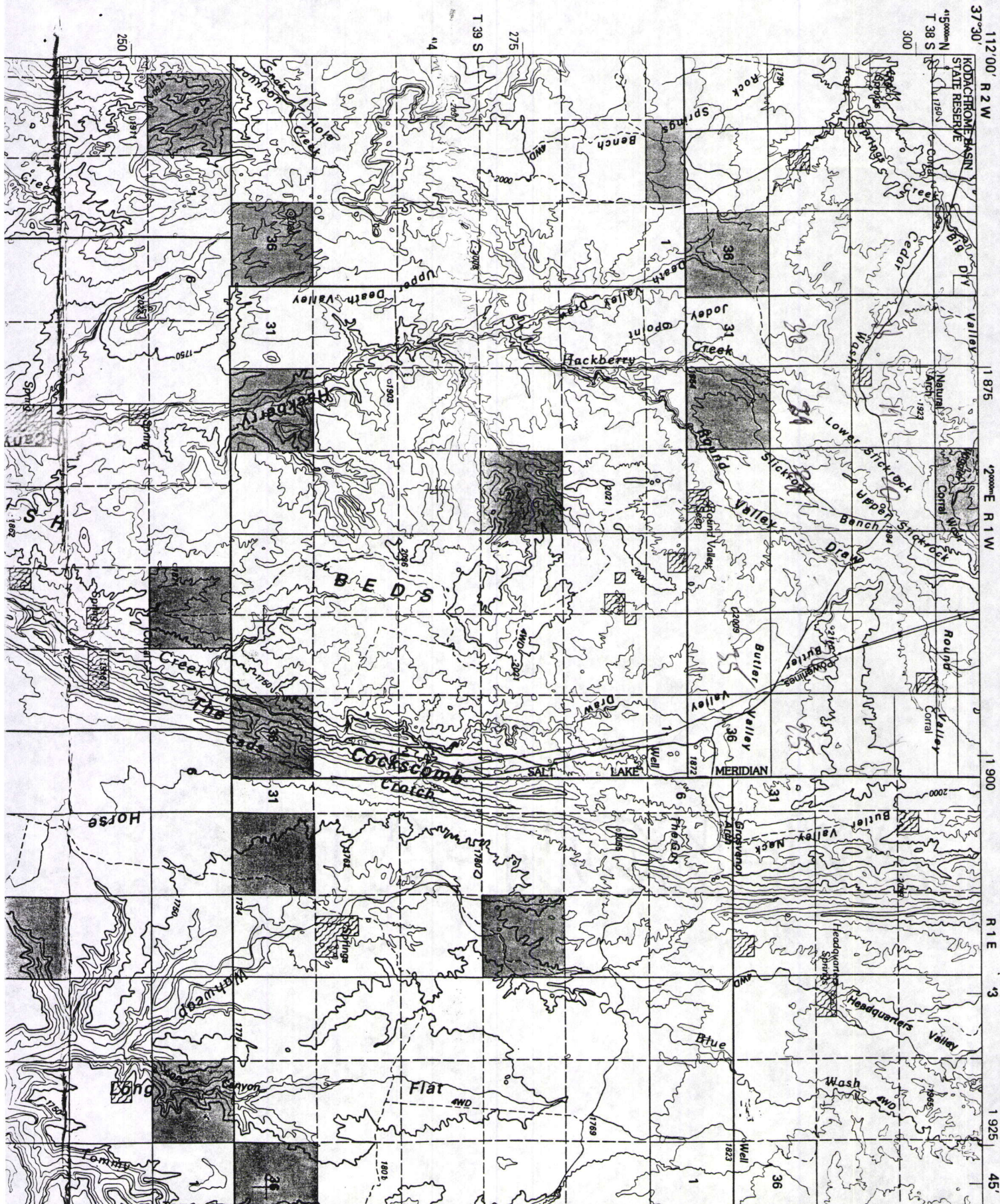
I am requiring you to clean up all of the litter and trash present on your alabaster claims by November 22, 1991. Failure to clean up these sites by this date will result in a formal Notice of Noncompliance under the regulations in 43 CFR 3809.3-2.

Our inspections did not reveal any other problems with your operations. I would appreciate your cooperation in cleaning up the trash from these claims, and in keeping your operations free of litter in the future. If you have any further questions or comments regarding this matter, please contact Rod Schipper at our office.

Sincerely,

  
Paul Chapman  
Acting Area Manager

RSCHIPPER:rs

[illegible]

Paul Lamoreaux  
95 North 200 East  
P.O. Box 610  
Cannonville, Utah, 84761

Dear Mr. Lamoreaux:

Your plans of operations (received in our Cedar City Office on June 1, 1986) are approved for the Uncle Red Group Nos. 1-3, Uncle Red "A", Berry Patch Nos. 1-18, Raspberry Nos. 1-9, Teddi Nos. 1-12, Heddi Nos. 1-3, Eddi No. 1, and Jedai Nos. 1-5 mining claims. As agreed in your telephone conversation on June 26, 1986 with Pete Kilbourne, the plans were amended to exclude new road construction in Sections 19 and 20, 38S, R1W and any operations on the Uncle Red (Sec 12, T39S, R1W) and Boutique No. 12 (Sec 12, T39S, R1W) claims. A plan amendment may be filed at a later date to propose construction of the road. A plan of operations under the 43 CFR 3802 regulations can be filed for the Uncle Red and Boutique No. 12 claims, if you so desire.

This approval is subject to the stipulations listed below.

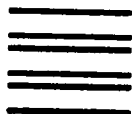
1. The public must be warned of the landslide hazard on the Jedai, Teddi, Heddi, and Eddi claims without use of a no trespassing sign. A no mineral trespassing sign may be used and the access road may be chained or blocked immediately below the hazard area, but access to safe parts of the claim must not be blocked in order to comply with Public Law (PL) 96-67. Mining operations are considered to be dangerous on these claims. However, all mining operations must be conducted in compliance with the requirements of the Mine Safety Health Administration, and BLM accepts no responsibility for any injury to the operator by approving operations on these or any other mining claims.

2. The existing no trespassing signs must be removed in order to comply with PL 167. No mineral trespassing or other signs which identify the locatable minerals or mining claims as belonging to Paul Lamoreaux may be erected.

3. Staff from the Kanab Resource Area will flag locations of the plant Penstemon atwoodii which is on the Federal Status Review List of proposed threatened or endangered plants. These locations should be avoided during mining.

4. All abandoned excavations must be reclaimed within 60 days of the approval of the plan of operations. As excavation areas are depleted and planned for abandonment, they must be recontoured before moving on to new areas.

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KANAB, UTAH 84741

(Name of Sender)

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

(City, State, and ZIP Code)

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KANAB, UTAH  
JUL 3 1986  
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PS Form 3811, July 1983 447-845

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1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

**3. Article Addressed to:**

Paul Lamoreaux  
195 North 200 East  
P.O. Box 610  
Parowan, Utah, 84761

**4. Type of Service:**

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| <input type="checkbox"/> Registered           | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD     |
| <input type="checkbox"/> Express Mail         |                                  |

**Article Number**

P 672 408 004

Always obtain signature of addressee or agent and **DATE DELIVERED.**

**5. Signature - Addressee**

X *Paul Lamoreaux*

**6. Signature - Agent**

X

**7. Date of Delivery**

**8. Addressee's Address (ONLY if requested and fee paid)**

DECISION RECORD/RATIONALE  
PAUL LAMOREAUX PLANS OF OPERATIONS UNDER 43 CFR 3809  
UNCLE RED (#1-#3), UNCLE RED, UNCLE RED "A",  
BOUTIQUE #12, BERRY PATCH #1-#18, RASPBERRY #1-#9,  
TEDDI #1-#12, HEDDI #1-#3, EDDI #1, & JEDAI #1-#5  
ALABASTER MINING CLAIMS  
DRY VALLEY AND BUTLER VALLEY  
(T38 & 39S, R1W/SLBM)  
EA #UT-040-45

ENVIRONMENTAL COMPLIANCE:

A review of the environmental assessment indicates that after consideration of mitigating measures, the proposed action would not result in undue or unnecessary degradation of the human environment and preparation of an Environmental Impact Statement is not required to further analyze the environmental effects of the proposed action.

DECISION:

Approve the plans of operations (Appendices A1 & A2, EA), as amended to exclude any operations on Uncle Red (Sec 12, T39S, R1W) and Boutique 12 (Sec 12, T39S, R1W) and to exclude new road construction in Sections 19 and 20, T38S, R1W at this time. A plan amendment may be filed at a later date to propose construction of the road. The approval of the plans is subject to the mitigation measures listed below which were developed in the environmental assessment.

RATIONALE:

Approval of a plan of operations which complies with the requirements of 43 CFR 3809 is nondiscretionary. The subject plans were found to adequately comply with those regulations except for the inclusion of Uncle Red (Sec 12, T39S, R1W) and Boutique 12 (Sec 12, T39S, R1W) which lie within the Wahweap Wilderness Study Area. Operations on these claims would have to be considered under 43 CFR 3802 because the lands are under wilderness review.

MITIGATION:

Landslide Hazard

The public must be warned of the landslide hazard on the Jedai, Teddi, Heddi, and Eddi claims without use of a no trespassing sign. A no mineral trespassing sign may be used and the access road may be chained or blocked immediately below the hazard area, but access to safe parts of the claim must not be blocked in order to comply with Public Law (PL) 167. Mining operations are considered to be dangerous on these claims. However, all mining operations must be conducted in compliance with the requirements of the Mine Safety Health Administration, and BLM accepts no responsibility for any injury to the operator by approving operations on these or any other mining claims.

Signing

The existing no trespassing signs must be removed in order to comply with PL 167. No mineral trespassing or other signs which identify the locatable minerals or mining claims as belonging to Paul Lamoreaux may be erected.

### Threatened or Endangered Plants

Staff from the Kanab Resource Area will flag locations of Penstemon alwoodii on the mining claims. These locations should be avoided during mining.

### Topography and Visual Resources

All abandoned excavations must be reclaimed within 60 days of the approval of the plans of operations. As excavation areas are depleted and planned for abandonment, they must be recontoured before moving on to new areas.

Prepared by:

Pat McNamee  
Area Geologist

4/30/86  
Date

Reviewed by:

Ken Knowles  
Environmental  
Coordinator

6-30-86  
Date

Approved by:

Rex Landry  
Kanab Area Manager

6-30-86  
Date

ENVIRONMENTAL ASSESSMENT

UT-040-86-45

PAUL LAMOREAUX, TWO PLANS OF OPERATIONS UNDER 43 CFR 3809  
UNCLE RED (#1-#3), UNCLE RED, & UNCLE RED "A";  
BOUTIQUE #12; BERRY PATCH #1-#18; RASPBERRY #1-9;  
TEDDI #1-#12; HEDDI #1-#3; EDDI #1; & JEDAI #1-#5

ALABASTER MINING CLAIMS  
DRY VALLEY AND BUTLER VALLEY  
(T38 & 39S, R1W SLBM)

Prepared by Pete Kilbourne  
Kanab Area Geologist, Cedar City District  
6/24/86

Participating Staff  
Blaine Lunceford, Range Conservationist  
Doug McFadden, Archaeologist  
Paul Carter, Geologist  
Phil Damon, Outdoor Recreation Planner Recreation

#### I. PURPOSE AND NEED

The purpose of this EA is to assess the environmental impacts of the proposal to mine alabaster as described in the attached plans of operations Appendices A1 and A2. The claims are being analyzed together because they are all part of the same operation and are located within a few miles of each other.

#### II. PROPOSED ACTION

Paul Lamoreaux proposes to continue mining in the Jedai, Heddi, Teddi, and Eddi claim groups (Appendix A1) and in the Berry Patch, Raspberry, Uncle Red, and Boutique alabaster mining claim groups (Appendix A2). He proposes to resume mining as soon as his plans of operations are approved.

The Jedai, Heddi, Eddi, and Teddi Groups are located in Dry Valley near Kodachrome State Park. Mining involves collecting blocks of alabaster that have fallen from the steep cliffs above. Additionally, Mr. Lamoreaux proposes to directly mine the cliffs between Jedai #1 and Jedai #2 in SE1/4 Sec 17, T39S, R1W. A new access is proposed in Sec 19 and 20 T39S, R1W (Appendix A1). On 6/26/1986, the plan was amended by Paul Lamoreaux through personal telephone communications with Pete Kilbourne to eliminate the proposal to build a new road in Sections 19 and 20, T38S, R1W. It was understood by Mr. Lamoreaux that he could amend the plan at a later date to include the proposed road.

The Berry Patch, Raspberry, Uncle Red, and Boutique claims are in Butler Valley near Grosvenor Arch and in the northern part of Cottonwood Canyon. Mining involves excavation of shallow backhoe pits utilizing existing access. According to the plan of operations none of the proposed activities would take place in a Wilderness Study Area. However, the Boutique #12 and Uncle Red claims lie within the Wahweap Wilderness Study Area (Appendix A2). On 6/26/1986, the plan was amended by Paul Lamoreaux through personal telephone communications with Pete Kilbourne to exclude any reference to Boutique #12 and Uncle Red.

The attached plan of operations, Appendix A1&2, provides details of the proposal.

#### III. NO ACTION ALTERNATIVE

This alternative cannot be chosen because mining of locatable minerals under 43 CFR 3809 is nondiscretionary from the BLM standpoint.

#### IV. OTHER ALTERNATIVES

No alternatives that would offer any significant environmental advantages over the proposed action were identified.

## V. EXISTING ENVIRONMENT

### Topography, Vegetation, and Soil Erosion

Most of the surface of the claims in the Butler Valley area (Uncle Red, Berry Patch Claims, and Raspberry groups) consists of gently rolling topography on the east side of brushy pinyon/juniper hills. The gentle surface is underlain by the gypsum (alabaster) deposit and is interrupted in a few spots by 1-8 foot high gypsum outcrops. The east side of the hills is sparsely vegetated which is typical of areas of residual gypsum soils.

The west side of these hills consists of steep, nearly barren slopes capped by a gypsum outcrop.

The surface at the base of the gypsum hills is typically an alluvial plain with abundant grasses.

There is little evidence of erosion of the gypsum hills or the alluvial plains in the immediate vicinity of the claims.

Most of the topography of the claims in the Dry Valley area (Jedai, Heddi, Teddi, Eddi and groups) consists of sparsely vegetated to barren cliffs and colluvial slopes. Below the steep colluvial slopes, more gentle slopes grade into the alluvium of Dry Valley. These areas contain pinyon and juniper, sage and other brush, and grasses. The grasses dominate and vegetation becomes more abundant toward Dry Valley.

Evidence of erosion on the lower slopes of the claims is minimal. The cliff and colluvial slopes are heavily eroded by natural slide processes.

### Slide Hazard

The Jedai, Teddi, Heddi, and Eddi claims are located on steep cliffs of highly fractured gypsiferous Carmel Formation. The area is unstable. Blocks of material periodically fall from the steep cliffs onto unstable colluvial slope. The blocks move down slope on top of the colluvium by slope creep and debris slide. When they reach the base of the slope they are mined.

The slide area is a significant slide hazard to the public. Mr. Lamoreaux is aware of the slide hazard and has posted no trespassing signs to keep people away from the area. However, rock collectors have gone into the area according to Mr. Lamoreaux.

Additionally, mining on these unstable slopes is inherently hazardous, although Mr. Lamoreaux states that he is aware of this and avoids use of heavy equipment when possible and restricts active mining to winter when the slopes are partially stabilized by frozen conditions.

### Visual Resources

Mr. Lamoreaux's alabaster mining in Butler Valley area has left numerous open pits. These excavations are typically small and shallow not exceeding 30 feet in length or width and 5 feet in depth. None of these excavations are noticeable from sightseeing areas such as the Cottonwood Road and Grosvenor Arch and its access road.

The mined cliff areas and colluvial slopes appear natural (nearly indistinguishable from unmined areas) except for the access roads along base of the colluvial slopes cliffs. These access roads are for the most part topographically screened from Dry Valley. The lower slopes at the edge of Dry Valley are unaffected by mining.

#### Signing

No trespassing signs have been posted by Mr. Lamoreaux at a few locations within his mining claims including the one discussed above in the Teddi, Jedai, Heddi, and Eddi groups. Mr. Lamoreaux has stated that these signs were erected in the above case for public safety and in the other cases to warn against mineral trespass.

#### Cultural Resources

No cultural resources were found within the boundaries of any of the subject claims (Appendix B).

#### Threatened or Endangered Species

No threatened or endangered animal species was found within the subject mining claims. However, the plant Penstemon atwoodii is on the Federal Status Review List of proposed threatened or endangered plants. The plant exists within the Uncle Red group, but not near any area proposed for development under the plan of operations. No other threatened or endangered plant exists within the claims.

#### Other Environmental Factors

None of the subject claims contain any unique geographic characteristics, park, wilderness values (for plan as ammended, see proposed action), recreation or refuge lands, wild or scenic rivers, sole or principal drinking water aquifers, prime and unique farmlands, floodplains/wetlands, or Areas of Critical Environmental Concern (ACEC) including those listed on the Department's National Register of Natural Landmarks.

### VI. ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION

#### Topography, Vegetation, and Soil Erosion

Changes in topography in the Butler Valley area would include an increase in size and number of shallow excavations. Minimal vegetation would be removed because of naturally low vegetative density on gypsum soil sites. Erosion rates are not expected to increase significantly.

Generally, changes in the topography in the Dry Valley area would be minimal due to the mining method which utilizes natural slide processes to transport the alabaster downslope. If the ridge between Jedai #1 and Jedai #2 is cut completely through, a permanent notch will be formed.

#### Land Slide Hazard

If unsuspecting rock hounds were to be collecting on the steep slopes of the Jedai, Teddi, Heddi, and Eddi groups when a slide occurred, severe injury or death could occur. However, this hazard would be present whether or not Mr. Lamoreaux continues to mine the sites.

Additionally, continued mining on these unstable slopes is hazardous. The safety measures Mr. Lamoreaux employs, such as avoiding use of heavy equipment when possible and restricting active mining to winter when the slopes are partially stabilized by frozen conditions, will minimize but not eliminate the hazard. The proposal to mine the cliffs between Jedai #1 and #2 would be particularly hazardous.

#### Signing

Placement of no trespassing signs on mining claims violates the intent of Public Law 167 (PL 167) which provided the United States the right to manage the surface of mining claims and in general to keep them open to the public. Although the apparent intent of the no trespassing signs is to prevent mineral trespass, it may appear to the public that the land is private property.

#### Visual Resources

Eventually, as the size and number of excavations in the Uncle Red group increase, they will become noticeable from the Cottonwood Road and the Grosvenor Arch area. This may be unsightly to some visitors.

The operations at the Jedai, Teddi, Eddi, and Heddi groups are generally well screened, although a notch, formed by mining of the cliffs between Jedai Nos 1 and 2, may be visible from Dry Valley. Such an excavation would eventually appear natural due to frequent landsliding.

#### Threatened or Endangered Plants

Pentstemon atwoodii is unlikely to be damaged in the short term. Eventually, mining may expand sufficiently to endanger the plant. Should this occur, plants within the mining area will be destroyed, and the habitat for these plants will be eliminated unless the topsoil that supported them is stockpiled and replaced during reclamation. However, numerous other locations of the plant have been recorded in the Kanab Resource Area, therefore destruction of the individual plants is not likely to jeopardize the survival of the species.

### VII. MITIGATION

#### Landslide Hazard

The public should be warned of the landslide hazard on the Jeddi, Teddi, Jeddi, and Eddi claims without use of a no trespassing sign. A no mineral trespassing sign could be used and the access road could be chained or blocked immediately below the hazard area, but access to safe parts of the claim should not be blocked in order to comply with PL 167.

#### Signing

The no trespassing signs should be removed in order to comply with PL 167. No mineral trespassing or other sign which identifies that the locatable mineral or mining claim belongs to Paul Lamoreaux could be erected.

#### Topography and Visual Resources

All abandoned excavations should be reclaimed within 60 days of the approval of the plan of operations. As excavated areas are depleted and planned for abandonment, they should be recontoured before moving on to new areas.

#### Threatened or Endangered Plants

Staff from the Kanab Resource Area will identify and flag locations of Penstemon atwoodii on the mining claims. These locations should be avoided during mining.

### III. ENVIRONMENTAL CONSEQUENCES OF THE NO ACTION ALTERNATIVE

Where mining has not yet occurred, the areas would continue to be affected by natural physical and biological processes, and no adverse impacts to the natural environment would occur. Where mining has occurred, it is unlikely that reclamation would be done because reclamation without the right to mine would be an economically adverse situation for Mr. Lamoreaux. It is also unlikely that BLM would reclaim the sites in the absence of appropriate policy and funds. Abandoned pits and other disturbances would be left. The land could not be fully utilized for other purposes without reclamation of these disturbances. A significant source of alabaster would become unavailable in the marketplace.

#### COMPLIANCE WITH BLM LAND USE PLANNING

The Paria Management Framework Plan has been reviewed. The proposed action has not been specifically addressed, but conforms because it does not change the uses, goals, or management outlined.

#### PERSON, GROUPS, AND GOVERNMENTAL AGENCIES CONSULTED

Paul Lamoreaux- Took Pete Kilbourne and Phil Damon on a tour of all operations.

PLAN OF OPERATIONS UNDER 43 CFR 3809 FOR THE  
TEDDI, HEDDI, EDDI, & JEDAI MINING CLAIMS IN  
KANE COUNTY, UTAH

RECEIVED  
BUREAU OF LAND MANAGEMENT  
CEDAR CITY DISTRICT

JUN 1 - 1986

1. Name & Address of mining claimant: Paul Lamoreaux, P.O. Box 610, Parowan, Utah. Street address and telephone number: 195 North 200 East, Parowan, Utah 84658. JUN 1 1986 4:12 PM

2. Name & Address of operator: Same as above.

3. Map. See Appendix A.

Name of Claim	Location	BLM Serial numbers
Teddi #1-#12	Sections 19 & 20, Twp. 38 So., Range 1 West, S.L.B.&M.	UMC 232658-232669
Heddi #1-#3,	Section 17, Twp. 38 So., Range 1 West, S.L.B.&M.	UMC #232649-232657
Eddi #1, Jedai #1-#5		

5. Information concerning operations: Background: The entire area of the claims was worked by previous claimants in the 1960s associated with a man named Dalley, probably for uranium and gypsum. Roads were built at that time on top the cliffs and around the northwest and south edges of the cliffs at the base. Some roads were reclaimed by nature but some are still in use.

Minerals of copper, manganese, uranium, possible vanadium and nickel, gypsum, alabaster and other minerals outcrop and underly the vertical cliffs on the entire Teddi, Heddi, Eddi and Jedai claims (Teddi Group).

The most valuable minerals so far identified are gash and slump veins and horizontal beds of Translucent Orange No. 500 alabaster occurring in about 125' of vertical section of maroon and green shale beds weathering as dessicated cliffs constituting the dominant feature of the property. Minerals other than gypsum weather rapidly but have been exposed within about a ten foot section of light to dark green clay, clay galls, shale or hard (siliceous?) mud beds under the cliff forming orange alabaster beds between the upper and lower bed of alabaster at the base of the cliffs. The cliffs are capped with a harder gypsum layer about 5 feet thick, the No. 1102 Silver Cloud.

Surface water runs down off the cliffs, trickling into cracks and crevices dissolving the gypsum along joint patterns, slumps and myriad pack rat holes which serve as a major eroding factor much utilized by the operators. As the water percolates into the green and red volcanic clay and ash beds at the cliff bases, the cliffs are undercut and weakened enough that they will collapse. These processes coupled with a very active wind force flake off the shale and shaly sandstone in tiny flakes to large rocks which collect as talus slopes and large landslides up to 700 feet long from cliff face to canyon bottoms. Rocks ranging from pebbles up to 100 ton or more boulders fall from the cliffs when geologic processes are tremendously accelerated during cloudburst or after a thaw in winter. The cliffs are dangerous to approach.

The Teddi Group produces large amounts of Silver Cloud, Castile Brown, Pink Carving No. 511 and the translucent orange alabaster; all are much used in sculpting trades. The property is valued for sale at \$4,000,000.00 by the operator and has the potential to produce many times that amount in alabaster.

Uranium and other minerals have yet to be explored or developed but are under current evaluation.

Original production was accomplished by "jackassing" out selected landslide stones, rolling them down the talus slopes and wheeled down the twisting gorges between rocks and trees. The work became extremely exhausting after a few years so minimal cross country roads and trails were made and each years annual assessment work helped to finally give sufficient access to permit safe, more convenient production. This plan of operations also constitutes a notice of intent besides that offered by existing proofs of labor.

Mining operations will consist of continued watch of landslide areas to recover freshly fallen alabaster. The economics of the deposit dictate the best areas to work after consideration of all the factors involved, including a very large and thoughtful environmental factor and a decision has been made to mine with equipment a pervasive zone of weakness extending from the Jedai No. 1 quarry to the Jedai-Heddi quarry No. 2. The Jedai No. 1 quarry is in the head of a narrow box canyon hidden from view on the north face of short canyon. An open pit running southwesterly from the box canyon into the backs of the landslide ledges east of the Jedai No. 2 quarry will mine 5 to 7 major veins of high quality orange alabaster, a bed of yellow and a bed of grey alabaster and numerous gash veins and horizontal veins of translucent orange and pink, a pervasive mineral series.

The operation will not be visible from the Wiggler Wash cowboy road nor from any other place but at the site or the air.

Mining will be by open cut pit and modified fill, stoping the zone of weakness. Prior to stoping the talus slope is being mined; unstable cliffs heavily laced with orange alabaster are being removed in order to make a safe work site. All the alabaster is sold as mined even down to the five pound chunks.

Since there is nothing like this material on the national market we cannot produce enough to even begin to satisfy the tremendous demand created in the lapidary, sculpting, mineral and interior decorating trades by this uniquely naturally colored material. All of the stones found in this general area have unique, beautiful shades of Color Country hues. This deposit is a necessary and important component of the family business and serves as a source of raw material for a great many United States businesses.

Operations will take place on minimum width already constructed or to be constructed roads consistent with terrain. Mining will be by backhoe and hand labor.. Maintenance will be performed each year on access roads and trails.

Wood cutting operations by others have heavily damaged esthetic and environmental considerations just south of the Teddi cliffs. What was once a shady pinon-cedar camping area is strewn with debris. We request that commercial green wood cutting not be permitted in the White Hills area, to avoid further damage to what could have been a nice BLM campground.

Projected operations will take place in areas marked A,B,C, & D on the attached map, with minimal expansion into connecting or adjacent undisturbed areas with the exception of the following:

a. We need a minimal, largely level road access into the canyon along the north end lines of the Teddi #7 thru #10 claims and south of what we call the Cheesecake. The road will be used to maintain claim corners/line and will allow recovery of additional alabaster with minimal disturbance to the environment and will be no different from numerous other access roads in the same general area and will turn off the Wiggler Wash road at the little sandy summit hump. We will be keeping the hump out of the middle of the Wiggler wash road and tree branches cut back to avoid damage to side mirrors on vehicles.

Mining will progress as follows: The backhoe will be walked in from the Kodachrome area. Trucks will be driven in with occasional trailers to the turnaround below the Jedai quarries, mostly in dry weather. Only the 4x4 vehicles and the backhoe and ATC will ascend the quarry upper road.

Cycle: The backhoe climbs up the canyon road from the turnaround to the face where mining and selection take place, returning to dump truck(s) parked at the turnaround below. Backhoe returns to quarry but is removed to the turnaround at night.

Waste is used to fill the box canyon over the existing bottom of jumbled boulders as the pit advances southwest. When almost to the sheer cliff on the east side of the Jedai No. 2 quarry, the pit will be stopped. Any further depths can be reached with deeper benches and wider stoping along pit walls. The narrow cliff at back of pit, with one face (the southwest) identical with the east face of the Jedai No. 2 quarry, will be allowed to erode naturally into a scenic neck. Top of dump and floor of pit will be left largely level, dump edge will be rounded slightly. All of the operation is out of sight.

Large boulders in canyon bottom will be "mined", along with all large such boulders at all sites. Alabaster will be recovered and rocks left will be no different from others in the canyon bottom. Orange alabaster and Silver Cloud will be mined. Large valuable boulders or slabs on rock slides will be brought down dragged by cables and drag scars will not be noticeable in the slide area.

Access by the public will not be permitted into mine area.. Appropriate signs will be maintained to free us from liability in case the public goes there in our absence. Garbage will be buried after mining ceases and as area is mined.

6. Measures to be taken to avoid undue degradation and to reclaim disturbed areas resulting from proposed operations:

- a. See details above in part.
- b. Access roads or trails will follow natural trails and blades will not be dropped so as not to remove grass when possible. There is no need to re-contour main access from Wiggler Wash since it is largely a minimal road and we propose that it be left to serve as a wood road for people after firewood.. We will reclaim any areas and recontour if necessary.
- c. Reseeding will be by natural succession.
- d. Main Jedai No. 1 road will be reclaimed after mining is completed as follows: Upper edge of cut will be dragged down; lip of cut dragged up by backhoe; natural hillwash will do the rest; we could do some reseeded. An approximate natural contour will be achieved where practical.

e. All canyon bottoms are naturally covered with erosion debris and jumbled rocks. Flat tops of any pit bottoms or dumps will be reseeded by crested wheatgrass or by natural succession.

7. Access and time operations will be conducted: From the present time until all mining ceases about 25 years from now 4x4 vehicles and all other machinery will use existing roads to arrive at mine site; mining will cease in winter or at times of low demand and will only be conducted on an intermittent basis as time, funds, weather and other factors dovetail. we anticipate about 5 mining visits to the property each year lasting about one to two weeks each. It is not possible to predict when the exact times will be due to the sudden nature of the business.
8. There are no known Indian artifacts, dwellings or other cultural features anywhere that we know of below the cliffs, or other cultural features on the property and if any are found they will be immediately reported to the BLM.
9. There are no water resources for livestock or man on the property and no permanent structures are contemplated. Wildlife consists of coyotes, rabbits, reptiles, squirrels and other rodents. Wiggler Wash flats are a hotbed of rattlesnakes in some wet years but that area is outside the claims. The rattlers there have a peculiar method of locomotion: they glide very rapidly across the tops of green young tumbleweeds in the evening, covering surprising distances in a short time. It is not wise to be careless on the flats at twilight or after dark, since it is common to see several snakes in an evening. There is no significant impact on such wildlife.
10. SUMMATION AND REQUEST: The operator agrees to reclaim and recontour as practicable under the regulations. The operation will have no permanent impact upon water resources, vegetation, wildlife, endangered species other than prospectors, power lines, or private land. Since the area is right next to and adjacent to areas of private land upon which survival cabins with food and other stockpiles of various natures including bomb shelters are taking place, it should serve as a buffer zone between wilderness and private land. The area has been desired by adjacent landowners for years but at time of location so far as we could ascertain was open to valid mineral location. The land is scenic, but mineral in character. We request that the BLM approve this plan of operation under CFR 3809.

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REQUIREMENTS FOR ENVIRONMENTAL PROTECTION:

The operator is also responsible for compliance with, Federal and State Air Quality standards; Federal and State water quality standards; Federal and State standards for the disposal and treatment of solid wastes.

All garbage, refuse or waste shall either be removed from the affected lands or disposed of or treated to minimize, so far as is practicable, its impact on the environment and the surface resources. All tailings, waste rock, trash, deleterious materials of substances and other waste produced by operations shall be deployed, arranged, disposed or treated to minimize adverse impact upon the environment, surface and subsurface resources.

The operator shall to the extent practicable, harmonize operations with the visual resources, identified by the authorized officer, through such measures as the design, location of operating facilities and improvements to blend with the landscape.

The operator shall take such actions as may be needed to minimize or prevent adverse impacts upon plants, fish, and wildlife, including threatened or endangered species, and their habitat which may be affected by operations.

The operator shall not knowingly disturb, alter, injure, or destroy any scientifically important paleontological remains or any historical or archaeological site, structure, building or object.

The operator shall immediately bring to the attention of the authorized officer any cultural and/or paleontological resources that might be altered or destroyed on Federal lands by his/her operations, and shall leave such discovery intact until told to proceed by the authorized officer.

No new access routes that would cause more than temporary impact and therefore would impair wilderness suitability shall be constructed in a wilderness study area. Temporary access routes that are constructed by the operator shall be constructed and maintained to assure adequate drainage and to control or prevent damage to soil, water, and other resource values. Unless otherwise approved by the authorized officer, roads no longer need for operations shall be closed to normal vehicular traffic; bridges and culverts shall be removed; cross drains, dips, or water bars shall be constructed, and the road surface shall be shaped to as near a natural contour as practicable, be stabilized and revegetated in the (approved) plan of operations..

The operator shall perform reclamation of those lands disturbed or affected by the mining operation conducted by the operator under an approved plan of operations containing reclamation measures stipulated by the authorized officer as contemporaneously as feasible with operations. The disturbance or effect on mined land shall not include that caused by separate operations in areas abandoned before the effective date of these regulations (43 CFR 3802).

An operator may propose and submit with his plan of operations measures for reclamation for of the affected area.

To the extent practicable, all operators shall protect all survey monuments, witness corners, reference monuments, bearing trees and line trees against unnecessary or undue destruction, obliteration or damage. If, in the course of operations, any monuments, corners, or accessories are destroyed, obliterated or damaged by such operations, the operator shall immediately report the matter to the authorized officer.

*Paul Lamoreaux*

*6/4/86*

*TEED GROUP*

Sim Apin  
U45401  
OG Lse

U43935  
OG Lse

1073124  
D/C Min  
Coal

1034210  
B/C

1097990  
D/C Min Coal

Sim Apin  
U45401  
OG Lse

Name & Claim Number

SYMBOL

TEDD1 #1-#12

T-1-12

MEXICAN #1-#5

M-1-5

JEDAI #1-#5

J-1-5

EDD1 #1-#3

E-1-3

HEDD1 #1-#5

H-1-5

BUM FILING 12-22-80

AREAS SHADED GREY IS THAT

BEING CLAIMED AND THIS

BUM FILING. PERIPHERAL

CLAIMS WILL BE ADDED AT

A LATER DATE.

T.38 So. R. 1 West

S.L.B. & M.

23 2 17.25 1 17.27 4 17.32 3 17.40 2 17.48 1 17.56 4 17.55 3 17.45 2 17.35 1 17.25 4 17.20 3 17.2

Sim Apin  
U45401  
OG Lse

U43935  
OG Lse

H-5  
H-4

H-2

M-5  
M-4  
M-3  
M-2  
M-1

E-4  
E-3

STATE  
LEASE

43-65-0241  
DC

SLICKROCK BENCH QUADRANGLE  
UTAH-KANE CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)

TEDAH #1  
QUARRY  
(NATURAL SLIDE)

TEDAH #2 QUARRY (SLIDE)  
HARD QUARRY (SLIDE)

WHITE  
SLIDE  
HILLS

NEED THIS ROAD

TRUCKS

TOWNSHIP 38 So.  
3659 III SW  
(HENRIEVILLE)

